

Dear FCC,

This is in regards to petition RM-10786 filed by No-Code International (NCI) which is asking the Commission to delete Element 1--the 5 WPM Morse code exam "totally" from the Amateur Service rules and grant "Tech Plus" privileges to current Technicians.

Even though the World Radiocommunication Conference 2003 (WRC-03) made optional the requirement to prove the ability to send and receive Morse code signals to operate below 30 MHz. I don't think the Commission should do away with the Morse code requirement here in the United States.

Countries such as Switzerland, Belgium, the UK, Germany, Norway and the Netherlands have already have moved to drop their Morse requirements and New Zealand and Australia are expected to do so soon, but these are only a few countries. Russia as already said that it would not change its Morse code or licensing requirements, and I am sure there are other countries who feel the same way too. I have not yet seen Canada, Mexico or any other Countries except for the few mentioned above that are doing away with the Morse code requirement.

Morse code is still being widely used in the amateur radio service and around the world, it is still used in the commercial radio industry, and by people who are physically disabled or handicapped as a means of communicating with others. U.S. NASA Astronauts to this day are still taught and use Morse code, the U.S. Navy still uses light Morse too. If Morse code is still being utilized by our own government and by people who are physically disabled, by licensed amateur radio operators here in the U.S. and around the world and by non amateurs, how can it be obsolete as some people say it is.

I myself being an ARRL Amateur Radio Volunteer Examiner for the past several years have seen people show up to exam sessions who were visually or hearing impaired or both. Those individuals were still able to pass any exam element they were administered, why, because they studied and prepared for the exams which is something most people don't do or want to do these days.

The Commission has already helped and encouraged the use of Amateur Radio by implementing Restructuring and reducing the Morse code speed requirement from 20 words per minute to the slow speed of 5 words per minute. But now some people or groups such as NCI and the NCVEC want to do away with the Morse code requirement altogether here in the United States.

The Amateur Radio Service community is not suffering from the loss to its ranks of a large number of potentially excellent operators because of the Morse code requirement as some people are claiming, the Morse code requirements are not preventing new people from enter the hobby either.

The Governments that still require Morse code testing for amateur radio licensing or HF access, far exceed those few countries or governments that do not. In my opinion for the Commission to do away with the Morse code requirement would be a big mistake that would only damage amateur radio's future and its reputation of having certified, qualified, skilled, and competent operators.

The fact that lots of radio amateurs have taken and passed the Morse code examination requirement over the years for HF access and continue to pass it even now, proves that Morse code testing is not a hindrance, limiting, or preventing licensed amateurs from upgrading nor is it stopping people from getting amateur radio licenses either.

The requirement for new prospective amateur applicants and licensed radio amateurs to demonstrate a Morse code skill for HF access should remain as it is now, and should not be changed or removed by the Commission.

We the United States should not make our decisions based on what other governments are acting upon just because a group such as NCI says we should. NCI's only reason for being in existence from its start or inception has been to do away with Morse code altogether from the Amateur Radio Service. I say no to RM-10786.

Sincerely,

Victor Magana, N1VM